James Kousouros

ATTORNEY AT LAW

 \sim

260 Madison Avenue, 22nd floor • New York, NY 1001 212 • 532 • 1934 / 212 • 532 • 1939 fax

E-mail: James@kousouroslaw.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 11/17/2020

EVAN M. ROCK SENIOR ASSOCIATE

EMMA J. COLE Legal Assistant

Via ECF

JAMES KOUSOUROS

FOUNDER & PRINCIPAL

Hon. Lorna G. Schofield United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Application GRANTED. Defendant Mullakandov's conditions of bail are temporarily modified to permit travel to the Southern District of Florida from January 22, 2020 through January 30, 2020. All other conditions of bail shall remain in effect. Defendant shall provide his pretrial officer with his itinerary prior to departure. The Clerk of the Court is respectfully directed to terminate the letter motion at docket number 585.

January 16, 2020

Dated:January 17, 2020 New York, New York

Re: <u>United States v. Mark Mullakandov (17-CR-262)</u>

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

This letter is respectfully submitted to request that the Court issue an Order permitting Mark Mullakandov to travel to Miami, Florida from January 22, 2020 to January 30, 2020. Mr. Mullakandov would travel to Miami on behalf of his employer, Expert Auto Group.

Mr. Mullakandov would attend auctions held on January 24 and 28 in addition to visiting several dealerships.

Mr. Mullakandov would stay at: 3700 Shady Ridge Rd, Fort Lauderdale, FL 33312.

Pretrial Services Officer Erin Cunningham and Assistant United States Attorney Andrew Thomas consent to the instant travel request provided Mr. Mullakandov provide his full travel itinerary to Pretrial Services prior to his departure.

Thank you for your courtesy and consideration.

Respectfully Submitted,
____/s/___
James Kousouros, Esq.

C.C. Noah Falk,
Andrew Thomas,
Assistant United States Attorneys

Erin Cunningham, United States Pretrial Services Officer